

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

JOHN K. GOODROW,

Plaintiff,

v.

Civil Action No.: 3:11CV020

FRIEDMAN & MACFADYEN, P.A., et al.

Defendants.

DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT

COMES NOW Defendants, Friedman & MacFadyen, P.A., and Johnie R. Muncy as Trustee (Defendants), by undersigned counsel, and moves to dismiss the Plaintiff's Complaint pursuant to Rule 12(b)(6) as the Complaint fails to state a claim upon which relief may be granted against the Defendants and fails to allege sufficient facts supporting the claims within said Complaint. A memorandum in support of Defendants' position accompanies this motion.

WHEREFORE, Defendants respectfully request that the Court grant their Motion to Dismiss, and enter an Order dismissing all of Plaintiff's claims with prejudice, and award Defendants their costs, including reasonable attorney's fees incurred in defending this action.

Respectfully Submitted,

Friedman & MacFadyen, P.A.,
And Johnie R. Muncy as Trustee,
By Counsel

By: /s/ Andrew T. Rich
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of February 2011, copies of
Defendants' Motion to Dismiss Plaintiff's Complaint, and Memorandum in Support of
Defendants' Motion to Dismiss were electronically filed in this case and were mailed,
postage prepaid, to:

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